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By ECF & Fax

Hon. Paul G. Gardephe
United States District Court for the
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

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Domenico De Sole, et al. v. Knoedler Gallery, LLC, et al., 12 Civ. 2313 (S.D.N.Y.)

Howard v. Freedman et al., 12 Civ. 5263 (S.D.N.Y.)

Dear Judge Gardephe:

As directed in this Court's Order of February 3, 2014, the parties have conferred regarding a proposed briefing schedule for motions for summary judgment in the above-noted matters. The parties have agreed to the following proposal and respectfully request this Court's approval:

Moving Briefs: June 13, 2014.

Opposition Briefs: July 25, 2014.

Reply Briefs: August 27, 2014.

In addition, defendant Jamie Andrade respectfully requests, with all parties' consent, three additional business days for the submission of his papers. Thus, the deadlines applicable to defendant Andrade would be June 18, 2014; July 30, 2014; and September 3, 2014, respectively.

Respectfully submitted,



Aaron H. Crowell

cc: All counsel (via ECF)

SO ORDERED:



Paul G. Gardephe, U.S.D.J.

Dated: Feb. 26, 2014